

1 Steven S. Kane, Esq., SBN: 061670  
Bonnie E. Kane, Esq., SBN: 167700  
2 **THE KANE LAW FIRM**  
402 W. Broadway, Suite 2600  
3 San Diego, CA 92101  
Telephone: (619) 236-8700  
4 Facsimile: (619) 236-1370  
E-mail: skane@thekanelawfirm.com  
5 E-mail: bonnie@thekanelawfirm.com

6 Attorneys for Ryan Rogers

7 **UNITED STATES BANKRUPTCY COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA**  
9 **SAN FRANCISCO DIVISION**

10 <i>In re:</i>	) <b>Case No. 19-30088 (DM)</b>
11 PG&E CORPORATION	) Chapter 11
12 -and-	) (Lead Case)
13 PACIFIC GAS AND ELECTRIC	) (Jointly Administered)
14 COMPANY	) <b>DECLARATION OF RYAN ROGERS IN</b>
Debtors.	) <b>SUPPORT OF MOTION TO</b>
15 <input type="checkbox"/> Affects PG&E Corporation	) <b>ALLOW/DEEM TIMELY LATE FILING</b>
16 <input type="checkbox"/> Affects Pacific Gas & Electric	) <b>OF PROOF OF CLAIM</b>
17 <input checked="" type="checkbox"/> Affects Both Debtors	) Date: June 7, 2022
18 <i>All papers shall be filed in the Lead Case,</i>	) Time: 10:00 a.m.
19 <i>No. 19-30088 (DM)</i>	) Place: <b>To Be Held Telephonically</b>
20 _____	) United States Bankruptcy Court
	) Courtroom 17
	) 450 Golden Gate Avenue, 16 <sup>th</sup> Floor
	) San Francisco, CA
	) Judge: Honorable Dennis Montali
	) <b>Objection Deadline: May 31, 2022</b>

21  
22 I, Ryan Rogers, hereby declare and state as follows:

23 1. This declaration is based upon my personal knowledge unless otherwise indicated. If  
24 called upon to testify as to the matters stated herein, I could and would competently do so.

25 2. On the day of the Camp Fire I was at work in Chico, California when I received word  
26 of the fire. I rent an apartment in Chico that was not involved in the fire.

27 3. Once I heard of the fire, my place of work closed and I immediately drove to Paradise  
28 to help my parents, brother, grandparents and great-grandfather evacuate.

4. I met my parents at their home located at 5086 Foster Road, Paradise, California. My mother asked me to go to my grandparent's home in upper Paradise and bring them with my great-grandfather to my parents' home.

5. Once we were at my parents' home, my mother evacuated with my grandparents and great-grandfather. I stayed behind with my father and brother, Travis Rogers, to secure the house and remove what we could.

6. We then got in our vehicles and drove for nearly 6 hours until we reached our agreed-upon meeting place in Chico. Twelve of my family members lived in my two-bedroom rented apartment for over a month.

7. The day after the fire, I was permitted back into Paradise. My parents' home was severely damaged, and the out-buildings and contents had burned.

8. I not only suffered severe emotional distress because of the fire but I also lost personal property that I had stored at my parents' house, including vehicle parts, tools, ladders, stall mats, lawn mower and camping equipment.

9. I did not file a timely claim because I did not know I could receive compensation for my personal property that was lost at my parents' home; nor was I aware that I could make a claim for emotional distress.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed at Sacramento, California, on 5/3/2022

**-DocuSigned by:**

**Ryan Rogers**